



ORIGINAL

DEPT. OF TRANSPORTATION
DOCKET SECTION

P.O. Box 28377 Green Bay, WI 54324-0377 920/983-3400 Fax 920/983-3404

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April 16, 1999

To Whom it may Concern:

RE: DOT DOCKET: FWHA - 98 - 3656 - 50

As an intermodal **drayman**, doing business with every major railroad and steamship line operating in Chicago,, IL, I would like to offer these comments on the above referenced docket.

We believe that the responsibility for **maintaining** intermodal containers, chassis and trailers needs to be shifted toward the equipment owner. Drivers are unable to do a proper inspection for a number of reasons: bad lighting in the yard and in the **outgate** inspection lines, weather, lack of mechanical aptitude, and time constraints, for example.

Emergency maintenance is difficult and time consuming--often tripling yard time. Third shift attention is Impossible to obtain. Often times there is no replacement equipment available. This equates to no load and no revenue.

Drivers are "coerced" into taking marginal chassis because the alternative is waiting in line for HOURS for a chassis flip. The answer to a bad order chassis is "go find a good one, pull it up to your load, then wait for the **yardman** to come and flip it". In a poorly lit yard containing dozens or hundreds of pool chassis, many of which are in the same condition as the one the driver has just bad ordered, this solution is no solution at all.

The railroads and container yard operators are in a position to address this road worthiness issue **by** inspecting and maintaining the units under their control. Currently, the railroads will notify a **drayman** of a grounded unit that **is** obviously bad order -- such as bulging doors from a freight shift -- and expect the **drayman** to come **into** the yard and move the unit to their repair facility to bad order It. They do not take a proactive approach to maintenance and repairs and their reactive approach is not effective.

Sincerely,

A handwritten signature in cursive script that reads "Kathryn Keyser".

Kathryn Keyser

Vice President Operations and Administration